

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
AT NASHVILLE

NIKKI BOLLINGER GRAE, individually  
and on Behalf of All Others Similarly  
Situated,

Plaintiffs,

v.

CORRECTIONS CORPORATION OF  
AMERICA, TENNESSEE, LLC, et al.,

Defendants.

Case No. 3:16-cv-02267  
Honorable Aleta A. Trauger  
Magistrate Judge Jeffrey S. Frensley

**MOTION OF THE NASHVILLE BANNER TO INTERVENE AND UNSEAL  
DOCUMENTS**

Comes now the *Nashville Banner*, through counsel, and pursuant to Federal Rule of Civil Procedure 24(b)(1), the First Amendment, and the common law, respectfully moves this Court:

- (1) for permission to intervene in this case for the limited purpose of requesting that the Court unseal all documents that have been sealed on the Court's docket; and
- (2) to unseal all documents that have been sealed on the Court's docket.

In support of this relief, the movant is filing an accompanying *Memorandum of Law*.

The Parties to this litigation and a non-party provider of sealed documents (the federal Bureau of Prisons) have been consulted regarding the relief sought by this motion. The Plaintiffs responded to say that they take no position on the relief sought. Neither the Defendants nor the BOP responded. However, given their previous opposition to the relief sought, the movant can confidently represent that this motion is opposed.

Respectfully submitted,

/s/ Daniel A. Horwitz

DANIEL A. HORWITZ, BPR #032176

MELISSA K. DIX, BPR #038535

LINDSAY SMITH, BPR #035937

HORWITZ LAW, PLLC

4016 WESTLAWN DR.

NASHVILLE, TN 37209

[daniel@horwitz.law](mailto:daniel@horwitz.law)

[lindsay@horwitz.law](mailto:lindsay@horwitz.law)

[melissa@horwitz.law](mailto:melissa@horwitz.law)

(615) 739-2888

*Counsel for the Nashville Banner*

## **CERTIFICATE OF SERVICE**

I hereby certify that on November 1, 2023, service of the foregoing document was made upon the following Filing Users through the Court's Electronic Filing System:

Michael Goldberg  
GOLDBERG LAW, PC  
1999 Avenue of the Starts, Suite 1100  
Los Angeles, CA 90067  
Email: [michael@goldberglawpc.com](mailto:michael@goldberglawpc.com)

Jeremy A. Lieberman  
J. Alexander Hood, II  
Marc C. Gorrie  
POMERANTZ, LLP  
600 Third Ave., 20th Floor  
New York, NY 10016  
Email: [jalieberman@pomlaw.com](mailto:jalieberman@pomlaw.com)  
Email: [ahood@pomlaw.com](mailto:ahood@pomlaw.com)  
Email: [mgorrie@pomlaw.com](mailto:mgorrie@pomlaw.com)

Paul Kent Bramlett  
Robert P. Bramlett  
BRAMLETT LAW OFFICES  
40 Burton Hills Blvd., Suite 200  
P. O. Box 150734  
Nashville, TN 37215  
Email: [pknashlaw@aol.com](mailto:pknashlaw@aol.com)  
Email: [robert@bramlettlawoffices.com](mailto:robert@bramlettlawoffices.com)

Christopher T. Cain  
SCOTT & CAIN  
550 W Main Avenue, Suite 601  
Knoxville, TN 37902  
Email: [cain@scottandcain.com](mailto:cain@scottandcain.com)

Christopher Hamp Lyons  
Christopher M. Wood  
ROBBINS GELLER RUDMAN &  
DOWD, LLP  
414 Union Street, Suite 900  
Nashville, TN 37219  
Email: [clyons@rgrdlaw.com](mailto:clyons@rgrdlaw.com)  
Email: [cwood@rgrdlaw.com](mailto:cwood@rgrdlaw.com)

Jerry E. Martin  
BARRETT JOHNSTON MARTIN & GARRISON, LLC  
Bank of America Plaza  
414 Union Street, Suite 900  
Nashville, TN 37219  
Email: [jmartin@barrettjohnston.com](mailto:jmartin@barrettjohnston.com)

Dennis J. Herman  
Willow E. Radcliffe  
Kenneth J. Black  
ROBBINS GELLER RUDMAN &  
DOWD, LLP  
Post Montgomery Center  
One Montgomery Street, Suite 1800  
San Francisco, CA 94104  
Email: [dherman@rgrdlaw.com](mailto:dherman@rgrdlaw.com)  
Email: [willowr@rgrdlaw.com](mailto:willowr@rgrdlaw.com)  
Email: [kennyb@rgrdlaw.com](mailto:kennyb@rgrdlaw.com)

Brian T. Glennon  
David J. Schindler  
Faraz Mohammadi  
Meryn C.N. Grant  
LATHAM & WATKINS, LLP (LA Office)  
355 S. Grand Avenue, Suite 100  
Los Angeles, CA 90071  
Email: [brian.glennon@lw.com](mailto:brian.glennon@lw.com)  
Email: [david.schindler@lw.com](mailto:david.schindler@lw.com)  
Email: [faraz.mohammadi@lw.com](mailto:faraz.mohammadi@lw.com)  
Email: [Meryn.Grant@lw.com](mailto:Meryn.Grant@lw.com)

Morgan E. Whitworth  
LATHAM & WATKINS  
505 Montgomery Street, Suite 2000  
San Francisco, CA 94111-2562  
Email: [morgan.whitworth@lw.com](mailto:morgan.whitworth@lw.com)

Elizabeth O. Gonser  
Milton S. McGee, III  
Steven Allen Riley  
RILEY, WARNOCK & JACOBSON  
1906 West End Avenue  
Nashville, TN 37203  
Email: [tmcgee@rwjplc.com](mailto:tmcgee@rwjplc.com)  
Email: [sriley@rwjplc.com](mailto:sriley@rwjplc.com)

Email: [egonser@rwjplc.com](mailto:egonser@rwjplc.com)

James A. Holifield, Jr.  
HOLIFIELD, JANICH, RACHAL, & ASSOCIATES, PLLC  
11907 Kingston Pike, Suite 201  
Knoxville, TN 37934  
Email: [aholifield@holifieldlaw.com](mailto:aholifield@holifieldlaw.com)

Sarah A. Tomkowiak  
LATHAM & WATKINS LLP (DC Office)  
555 Eleventh Street, NW, Suite 1000  
Washington, DC 20004-1304  
Email: [sarah.tomkowiak@lw.com](mailto:sarah.tomkowiak@lw.com)

Patrick V. Dahlstrom  
POMERANTZ, LLP  
10 South La Salle St., Suite 3505  
Chicago, IL 60603  
Email: [pdahlstrom@pomlaw.com](mailto:pdahlstrom@pomlaw.com)

Ellen Gusikoff Stewart  
Jason A. Forge  
Natalie F. Lakosil  
Rachel L. Jensen  
ROBBINS GELLER RUDMAN &  
DOWD, LLP (San Diego)  
655 W Broadway, Suite 1900  
San Diego, CA 92101  
Email: [elleng@rgrdlaw.com](mailto:elleng@rgrdlaw.com)  
Email: [jforge@rgrdlaw.com](mailto:jforge@rgrdlaw.com)  
Email: [nlakosil@rgrdlaw.com](mailto:nlakosil@rgrdlaw.com)  
Email: [rachelj@rgrdlaw.com](mailto:rachelj@rgrdlaw.com)

Brian Schall  
Schall Law Firm  
2049 Century Park East Suite 2460 Los Angeles, CA 90067  
Email: [brian@schallfirm.com](mailto:brian@schallfirm.com)

Brice M. Timmons #29582  
Craig A. Edgington #38205  
DONATI LAW, PLLC  
1545 Union Ave.  
Memphis, Tennessee 38104  
(901) 278-1004 – Telephone  
(901) 278-3111 – Facsimile  
[brice@donatilaw.com](mailto:brice@donatilaw.com)

[craig@donatilaw.com](mailto:craig@donatilaw.com)

WYNN M. SHUFORD  
Assistant United States Attorney  
110 9th Avenue South, Suite A-961  
Nashville, TN 37203  
Telephone: (615) 736-5151  
Facsimile: (615) 401-6626  
Email: [wynn.shuford@usdoj.gov](mailto:wynn.shuford@usdoj.gov)

By: /s/ Daniel A. Horwitz  
Daniel A. Horwitz, Esq.